

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES, Plaintiff	Case No. 3:10-00260-15
vs	Hon. Haynes
DAHIR NOR IBRAHIM, Defendant	

DNIB
Motion to
Join
Will
W
4-23-12

**MOTION TO JOIN DEFENDANT NO. 8'S MOTION TO EXCLUDE TESTIMONY
OF JANE DOE 5**

Defendant Dahir Nor Ibrahim, Defendant No. 15, moves to join the motion to exclude the testimony of Jane Doe 5 filed by Defendant No. 8. (D.E. 2338).

As additional grounds, Defendant states as follows:

1. The government filed a response to the Court's order regarding Defendant's motion for a bill of particulars on March 28, 2012. (D.E. 2188) In that response, the government alleged the following facts against the Defendant:
 - a. In 1999, when Jane Doe 5 was allegedly 15 years of age, she was prostituted by Defendant No. 1.
 - b. Dahir "Lucky" (Def. No. 15) took girls to apartments in Minnesota on a regular basis.
 - c. "Everyone knew" Lucky and that Lucky "gave all the guys money".
 - d. Lucky and Adan (Def. No. 1) prostituted "other girls" who were teenagers.
 - e. Lucky recruited teenagers.
 - f. Lucky took these girls to various apartments for prostitution.
 - g. All the above occurred in the summer of 1999 and 2000.
 - i. 18 U.S.C. 1591 was enacted in October 28, 2000, P.L. 106-386 §112(a)(2), 114 Stat. 1487. Therefore, each and every act alleged above occurred before the law was enacted and were not illegal under federal